

FEDERAL DEFENDER OFFICE
DISTRICT OF MASSACHUSETTS
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February 8, 2006

Antoinette E. M. Leoney, Esq.
Assistant United States Attorney
United States Attorney's Office
John Joseph Moakley U.S. Courthouse
1 Courthouse Way
Boston, MA 02210

Re: United States v. Reylando Reyes; Criminal No. 05-10113-DPW

Dear Ms. Leoney:

This is in follow-up to my discovery letter dated December 23, 2005 and your responses thereto.

On the issue of documents that reflect that Officers Laham and Cogavin ran a query of Mr. Reyes' driver's license, I am still not satisfied that a complete and comprehensive search for such documents has occurred. In your response dated January 31, 2006 you indicate that the officers do not receive printouts of the results of such requests. While I understand that to be true, I believe that a record of such a search is available either from the Registry or from Police Headquarters. Furthermore, Bates Nos. 13-15, previously referenced by you as confirming such an inquiry, appear to be a search of the warrant service not the registry. Specifically, look at Bates No. 013 that confirms that this search information is with regard to warrants. I would ask that you make a further inquiry into whether there are in fact any documents that reflect that the officers in question ran Mr. Reyes' name through a Registry of Motor Vehicles database with regard to his license status.

In addition, you provided evidence logs for the bullet, cell phone, and notebook, but I did not receive any such logs for the marijuana and cocaine recovered in this case. Kindly provide me with those logs.

FEDERAL DEFENDER OFFICE

Please call me if you have any questions about these requests or wish to discuss them further.

Sincerely,

A handwritten signature in black ink, appearing to read 'Stellio Sinnis', with a stylized, cursive script.

Stellio Sinnis

cc. ↘ Mr. Jarrett Lovett, Deputy Courtroom Clerk to the Honorable Joyce London Alexander
Mr. Reylando Reyes